FILED IN OPEN COURT
ON 11/1/10 AP
Julia Richards Johnston, Clark
US District Court
A Eastern District of NC

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

No. 5:14-CR-240-BR

UNITED STATES OF AMERICA)	
)	
v.)	SUPERSEDING
)	INDICTMENT
)	
WILLIAM SCOTT DAVIS, JR.)	
-		

The Grand Jury charges that:

COUNT ONE

Beginning in or about February 2012, and continuing through the present, in the Eastern District of North Carolina and elsewhere, the defendant, WILLIAM SCOTT DAVIS, JR., with the intent to kill, injure, harass, and intimidate Victim #1, a person whose identity is known to the Grand Jury, did use an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce, to wit: e-mail, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim #1, in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT TWO

Beginning in or about February 2012, and continuing through the present, in the Eastern District of North Carolina and

elsewhere, the defendant, WILLIAM SCOTT DAVIS, JR., with the intent to kill, injure, harass, and intimidate Victim #2, a person whose identity is known to the Grand Jury, did use an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce, to wit: e-mail, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim #2, in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT THREE

Beginning in or about February 2012, and continuing through the present, in the Eastern District of North Carolina and elsewhere, the defendant, WILLIAM SCOTT DAVIS, JR., with the intent to kill, injure, harass, and intimidate Victim #3, a person whose identity is known to the Grand Jury, did use an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce, to wit: e-mail, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim #3, in violation of Title 18, United States Code, Section 2261A(2)(B).

COUNTS FOUR THROUGH SIX

On or about each of the dates reflected below for each of Counts Four through Six, in the Eastern District of North Carolina and elsewhere, the defendant, WILLIAM SCOTT DAVIS, JR., then in Virginia, knowingly and willfully did transmit in interstate and foreign commerce, a communication, to wit: an email, to a person whose identity is known to the Grand Jury and who was then located in North Carolina, and the communication contained a threat to kidnap and injure a person known to the Grand Jury as specifically indicated below:

COUNT	DATE	VICTIM #	THREAT MADE
FOUR	7/17/2014	#1, #3	"I am going to wearing [sic] her mother fucking prejudicial white ASS out she will never be able to walk again or practice law I'm going to be the only one doing the fucking around her, with big ten mile long Black Dick, and 30 miles Wide
FIVE	8/6/2014	#1, #2	"my foot up you MF ass. Bit_h !!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

SIX	8/17/2014	#3	"There is no where [sic] you, your family, your husband is going to be
			able to run and hide, and there is no damn thing
			that you are going to be able to do to stop what's
			coming to your family, your husband [sic] way.
			GOD HELP you"

Each count in the above table constituting a separate violation of Title 18, United States Code, Section 875(c).

Δ	TRUE	RTLL

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

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DATE: \\\\-\\\

JOHN STUART BRUCE United States Attorney

BY: ETHAN A. ONTJES

Assistant United States Attorney